



California Regional Water Quality Control Board

Santa Ana Region



My Tamminen
Secretary for
Environmental
Protection

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Arnold Schwarzenegger
Governor

M60050_003827
MCAS EL TORO
SSIC NO. 5090.3.A

June 16, 2004

Base Realignment and Closure
Attn: Mr. F. Andrew Piszkin, P.E.
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, CA 92618

COMMENTS ON FINAL GROUNDWATER MONITORING REPORT, SEPTEMBER 2003 MONITORING ROUND 18, FORMER MARINE CORPS AIR STATION, EL TORO

Dear Mr. Piszkin:

We have reviewed the above referenced document, dated April 16, 2004, which we received on April 21, 2004. We have the following comments:

- **Executive Summary, Recommendations**, Page vii and **Section 4, Conclusions and Recommendations, 4.2 Recommendations**, Page 4-5, first paragraph: The report recommends consolidation of the groundwater monitoring programs for the petroleum release sites and the Installation Restoration Program sites. It also states that monitoring efficiency will be improved with cost savings. The basis for improved efficiency and cost savings are not supported with further information and data. Owing to the lack of this information, we are not inclined to support the recommendation. We initially required groundwater sampling at specific petroleum release sites at your former facility, based upon the existing information for these sites. We have no reason to concur with your proposed consolidation of the two monitoring programs into a single program. Further, we believe that a combined monitoring program for these sites would result in an overall loss of specific water quality information that will be critical to evaluating the potential for closure at each individual site in the future.
- **Section 4, Conclusions and Recommendations, 4.2 Recommendations**, Page 4-5, second paragraph: Your report recommends redevelopment of three monitoring wells with historically high turbidity readings. Wells that had high turbidity readings during the last sampling are proposed for redevelopment after future sampling. We recommend that all wells with elevated turbidity be redeveloped, or considered for redevelopment at this time.



California Environmental Protection Agency

- **Section 4, Conclusions and Recommendations, 4.2 Recommendations, Page 4-6:** Future evaluation of the passive diffusion bag (PDB) sampling method was identified. We do not support changing the sample collection methods without considering other appropriate means of optimizing cost efficiency for groundwater monitoring.

For any questions, please call me at (909) 782-4494, or send email to jbroderic@rb8.swrcb.ca.gov.

Sincerely,


John Broderick
SLIC/DoD Section

cc: Ms. Nicole Moutoux, US EPA, Region 9
Mr. Tayseer Mahmoud, DTSC, Office of Military Facilities
Mr. Marc Smits, NAVFACENGCOM, Southwest Division